REMARKS

Claims 1-22, 29, 21-33, 35-37, 39-41, 43 and 44 were examined and stand rejected. Claims 23-28, 30, 34, 38 and 42 were withdrawn from consideration. Applicants amend Claims 1-3, 5-7, 14-19, 29, 31-33, 35-37, 49-41 and 43-44. Applicants cancel Claims 8-13 and 20-22. Applicants reserve the right to prosecute the former claims in a divisional or continuation application. Applicants respectfully request reconsideration of pending Claims 1-7, 14-19, 29, 31-33, 35-37, 39-41 and 43-44, as amended, in view of at least the following remarks.

I. Claims Rejected Under 35 U.S.C. §102

The Patent Office rejects Claims 1-3, 5-6, 8-9, 11-12, 14-15, 17-18, 20-21, 29, 31-33, 35-37, 39-41 and 43-44 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,326,984 B1 issued to Chow, et al. ("Chow"). Applicants respectfully traverse this rejection.

Applicants respectfully assert that the Examiner has failed to adequately set forth a *prima facie* rejection under 35 U.S.C. §102(b). "Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, *arranged as in the claim.*" *Lindemann Maschinenfabrik v. American Hoist & Derrick* ("Lindemann"), *730 F.2d 452, 1458 (Fed. Cir. 1994)*(emphasis added). Additionally, each and every element of the claim must be exactly disclosed in the anticipatory reference. *Titanium Metals Corp. of American v. Banner* ("Banner Titanium"), *778 F.2d 775, 777 (Fed. Cir. 1985).*

Regarding Claims 1 and 17, Claims 1 and 17 are amended to include the following feature, which is neither taught nor suggested by the references of record:

> processing the color components of the image in the mixed format of planar format and packed format.

After careful review of Chow, Applicants respectfully submit that the processing of color components in the mixed format is specifically prohibited by Chow. According to Chow:

> During a store operation, the interleaving/de-interleaving block 30 rearranges the image data before it stores it in the memory 10. This rearranging of the data follows fetches from the memory 10 by the display output engine 20 to be much more efficient. When data is fetched from memory 10, the interleaving/de-interleaving block 30 must de-interleave or un-rearrange the data such that it is in the format expected by the fetching component. (Col. 4, lines 23-30.)

In addition, according to Chow, the storage format described of packing U and V planes into a packed UV plane 80 will allow a Y plane to remain in its received format to improve memory access efficiency. According to Chow:

> In typical memory structures, when access to a single page within memory is performed, it is an efficient access. However, when more than one page within the memory are accessed to retrieve data for processing, a penalty is incurred. (Col. 3, lines 63-67.)

> For this reason, the data within the Y, U and V planes is intermingled within the present invention to allow these accesses to be more efficient. (Col. 4, lines 6-8.)

In other words, Applicants, after reviewing the cited passages, interpret the merry-merry storage format as taught by Chow to enable efficient memory access. However, once the information is retrieved from memory, the information must be interleaved or rearranged such that it is in the format expected by the fetching component. In other words, Chow cannot teach or suggest the limitation of processing color components in the mixed format, as required by Claim 1 of the invention.

Accordingly, Applicants respectfully submit that the Examiner fails to establish a *prima facie* rejection of Claims 1 and 17, as amended. Since Chow does not teach each and every element required by Claims 1 and 17, as amended. *Id.* Accordingly, Claims 1 and 17, as amended, are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 1.

Regarding Claims 2 and 3, Claims 2 and 3 depend from Claim 1 and therefore include the patentable claim features of Claim 1, as described above. Therefore, Claims 2 and 3, for at least the reasons described above, are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 2 and 3.

Regarding Claim 18, Claim 18 depends from Claim 17 and therefore includes the patentable claim features of Claim 17, as described above. Accordingly, Claim 18 is patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 18.

Regarding Claims 5 and 14, Claims 5 and 14 have been amended to include the following feature, which is neither taught nor suggested by either Chow or the references of record:

> processing the color components of the image in the mixed format of planar format and packed format.

For at least the reasons described above, Chow teaches away from such a limitation due to the fact that the interleaving/de-interleaving block must de-interleave or un-rearrange the data such that it is in the format expected by the fetching component. (Col. 4, lines 28-30.)

Accordingly, for at least the reasons described above, Applicants respectfully submit that the Examiner cannot establish a *prima facie* rejection of Claims 5 and 14, as amended, since neither Chow nor the references of record can teach processing of the color components in the mixed storage format, as required by Claims 5 and 14. Therefore Claims 5 and 14, as amended, are patentable over Chow as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 5 and 14.

Regarding Claim 6, Claim 6 depends from Claim 5 and therefore includes the patentable claim features of Claim 5. Therefore, for at least the reasons described above, Claim 6 is patentable over Chow as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 6.

Regarding Claim 15, Claim 15 depends from Claim 14 and therefore includes the patentable claim features of Claim 14. Accordingly, for at least the reasons described above, Claim 15 is patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claim 15.

Regarding Claims 29 and 33, Claims 29 and 33 are amended to include the following claim feature, which is neither taught nor suggested by the references of record:

> motion compensating the decoded block of color components in the mixed format according to a motion vector and a reference frame stored in the mixed format of the planar format and the packed format;

In contrast, as indicated above, the storage format as taught by Chow is specifically limited to the memory storage and memory access such that once data is fetched from memory, the interleaving/de-interleaving block must de-interleave or un-rearrange the data such that it is in the format expected by the fetching component. (Col. 4, lines 27-30.)

Accordingly, for at least the reasons described above, the Examiner cannot establish a *prima facie* rejection of Claims 29 and 33 under 35 U.S.C. §102(b) since Chow teaches away from processing and specifically, motion compensating of color components in the mixed format, as required by Claims 29 and 33 of the invention. Accordingly, Claims 29 and 33 of the invention are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 29 and 33.

Regarding Claims 31 and 32, Claims 31 and 32 depend from Claim 29 and therefore include the patentable claim features of Claim 29. Accordingly, for at least the reasons described above, Claims 31 and 32 are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 31 and 32.

Regarding Claims 35 and 36, Claims 35 and 36 depend from Claim 33 and therefore include the patentable claim features of Claim 33. Accordingly, for at least the reasons described above, Claims 35 and 36 are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 35 and 36.

Regarding Claims 33 and 41, Claims 33 and 41 are amended to include the following claim features, which are neither nor suggested by the references of record:

motion compensating the decoded block of color components in the mixed format according to a motion vector and a reference frame stored in the mixed format of the packed format and the planar format.

As indicated above, this feature of processing the color components in the mixed format, such as motion compensating the color components, is specifically prohibited by Chow due to the fact that Chow requires the de-interleaving or un-rearranging of data to place it in the format expected by the fetching component to the send. The various components within the system described by Chow require data in the described planar format, as illustrated with reference to FIG. 2 of Chow. Accordingly, Applicants respectfully submit that Chow cannot teach or suggest the motion compensating of color components in the mixed format, as required by Claims 37 and 41, as amended.

Therefore, for at least the reasons described above, the Examiner fails to establish a *prima facie* rejection of Claims 37 and 41, as amended, since neither the Chow reference nor the references of record can teach the processing of color components in the mixed format, as required to establish each of the limitations of Claims 37 and 41, as amended, to effectively establish a *prima facie* rejection thereof under 35 U.S.C. §102(b). Accordingly, for at least the reasons described above, Claims 37 and 41, as amended, are patentable over the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 37 and 41.

Regarding Claims 39 and 40, Claims 39 and 40 depend from Claim 37 and therefore include the patentable claim features of Claim 37. Accordingly, Claims 39 and 40 are patentable over Chow, as well as the references of record for at least the reasons described above. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 39 and 40.

Regarding Claims 43 and 44, Claims 43 and 44 depend from Claim 41 and therefore include the patentable claim features of Claim 41. Accordingly, for at least the reasons described above, Claims 43 and 44 are patentable over Chow, as well as the references of record. Consequently, Applicants respectfully request that the Examiner reconsider and withdraw the §102(b) rejection of Claims 43 and 44.

III. Claims Rejected Under 35 U.S.C. §103

The Patent Office rejects Claims 4, 7, 10, 13, 16, 19 and 22 under 35 U.S.C. §103(a) as being unpatentable over Chow in view of U.S. Patent No. 6,078,690 issued to Yamada, et al. ("Yamada"). Applicants respectfully traverse this rejection.

Regarding Claim 4, Claim 4 depends from Claim 1 and therefore includes the patentable claim features of Claim 1, as described above. Furthermore, the Examiner's inclusion of Yamada fails to rectify deficiencies of Chow in teaching processing of color components in the mixed

format, as described above. Accordingly, Claim 4, for at least the reasons described above, is patentable over Chow and Yamada, as well as the references of record. Consequently, Applicants respectfully request the Examiner reconsider and withdraw the §103(a) rejection of Claim 4.

Regarding Claim 7, Claim 7 depends from Claim 5 and therefore includes the patentable claim features of Claim 5, as described above. As indicated above, Yamada does not rectify the deficiencies of Chow in teaching processing of color components in the mixed format, as required by Claim 7 due to its dependency on Claim 5. Accordingly, Claim 7, for at least the reasons described above, is patentable over the references of record. Consequently, Applicants respectfully request the Examiner reconsider and withdraw the §103(a) rejection of Claim 7.

Regarding Claim 16, Claim 16 depends from Claim 14 and therefore includes the patentable claim features of Claim 14, as described above. As indicated, the Examiner's citing of Yamada fails to rectify the deficiencies attributed to Chow in teaching processing of color components in a mixed format. Accordingly, for at least the reasons described above, Claim 16 is patentable over Yamada, Chow and the references of record. Consequently, Applicants respectfully request the Examiner reconsider and withdraw the §103(a) rejection of Claim 16.

Regarding Claim 19, Claim 19 depends from Claim 17 and therefore includes the patentable claim features of Claim 17, as described above. Also as indicated above, the Examiner's citing of Yamada fails to rectify the deficiencies attributed to Chow in teaching processing of color components in a mixed format, as required by Claim 19 due to its dependency on Claim 17. Accordingly, Claim 19 is patentable over Chow, Yamada and the references of record. Consequently, Applicants respectfully request the Examiner reconsider and withdraw the §103(a) rejection of Claim 19.

CONCLUSION

In view of the foregoing, it is submitted that Claims 1-7, 14-19, 29, 31-33, 35-37, 39-41 and 43-44 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,
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Dated: July 7, 2003

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to: Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on July 7, 2003.

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Marilyn Bass *July 7, 2003*